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5
6 United States District Court
7 Eastern District of Washington
(Honorable Judge Mary K. Dimke)

8 United States of America,
9 Plaintiff,

10 v.

11 Antonia R. Leal,
12 Defendant(s).

No. 4:24-CR-06017-MKD-1

Unopposed Motion to Continue Pre-Trial
and Trial Dates

Notice of Hearing on Motion
January 23, 2025, at 1:30 p.m. Richland

14 Antonia Leal, through counsel, Zachary L. Ayers of Ayers Law Firm, P.L.L.C.,
15 moves the Court to continue the pre-trial and trial dates, all of which will be
16 compatible with the Court's calendar.
17

18 Initial discovery has been produced and additional discovery is anticipated to be
19 produced on a rolling basis. Counsel for the defendant requires more time to consult
20 with Ms. Leal and investigate the case and prepare for pretrial motions and trial.
21 Continuing the trial to May 28, 2025, and Pre-trial to May 8, 2025, at 1:30pm will
22 permit Counsel for Ms. Leal enough time to prepare an adequate defense for trial and
23 complete further investigation of the discovery and consultation with him. Ms. Leal is
24 anticipated to execute a speedy trial waiver.
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Counsel has conferred with the AUSA Rebecca Perez, who does not object to this request. Counsel has conferred with Mr. Meza's attorney, Richard Smith, who does not object to this request. Ms. Leal understands this request for a continuance is necessary for an adequate defense at trial and agrees that it is needed for defense counsel to effectively represent her.

The additional time requested in this continuance is excludable from the speedy trial calculation. Counsel for the defendants cannot effectively represent their clients without a continuance. See, 18 U.S.C. § 3161(h)(7)(B)(iv). The public and defendant's interest in a speedy trial is outweighed by Counsel's need for a continuance. 18 U.S.C. § 3161(h)(7)(A). Therefore, it is requested that the Court grant a continuance and set new deadlines for the filing of pretrial motions and trial memoranda.

Proposed Case Management Deadlines:

USA and Defense Expert Disclosure Deadline	April 3, 2024
All pretrial motions, including discovery motions, <i>Daubert</i> motions, and motions <i>in limine</i> , filed	Motion deadline: April 17, 2025 Response deadline: April 24, 2025 Reply deadline: May 1, 2025
PRETRIAL CONFERENCE <i>Deadline for motion to continue trial</i>	May 8, 2025 1:30p.m.-RICHLAND
CIs' identities and willingness to be interviewed disclosed to Defendant (if applicable)	May 9, 2025
Grand jury transcripts produced to Defendant Case Agent: CIs: Other Witnesses:	May 9, 2025
Exhibit lists filed and emailed to the Court	May 14, 2025
Witness lists filed and emailed to the Court	May 14, 2025
Trial Briefs, jury instructions, verdict forms,	May 14, 2025

1	and requested <i>voir dire</i> filed and emailed to	
2	the Court	
3		
4	Exhibit binders delivered to all parties and	May 21, 2025
5	to the Court	
6	Delivery of JERS-compatible digital	May 21, 2025
7	evidence files to the Courtroom Deputy	
8	Trial notices filed with the Court	
9	Technology readiness meeting (in-person)	
10	FINAL PRETRIAL CONFERENCE	May 28, 2025 8:30am-RICHLAND
11	JURY TRIAL	May 28, 2025 9:00am-RICHLAND

12 DATED this 6th day of January 2025.

13 Respectfully Submitted,

14 s/ Zachary L. Ayers

15 Zachary L. Ayers, WSBA#46496

16 Attorney for Ms. Leal.

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Service Certificate

I hereby certify that on January 6, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Rebecca Perez and Brandon Pang, Assistant United States Attorney.

s/Zachary L. Ayers
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